

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<p><b>D. G. Sweigert,</b></p> <p style="text-align: center;"><b>Plaintiff</b></p> <p style="text-align: center;"><b>Versus</b></p> <p><b>Jason Goodman,</b> <b>dba 21<sup>st</sup> Century 3D</b> <b>dba CrowdSource The Truth</b></p> <p><b>Corean Elizabeth Stoughton</b> <b>dba DEEP NSA</b></p> <p><b>GOOGLE, LLC,</b> <b>aka YOUTUBE, LLC,</b> <b>aka ALPHABET, INC.</b> <b>Delaware Corporations</b></p> <p><b>TWITTER, INC.,</b> <b>aka X CORP</b> <b>A Nevada Corporation</b></p> <p style="text-align: center;"><b>Defendants</b></p>	<p style="text-align: center;"><b>PRO SE</b></p> <p style="text-align: center;"><b>23-cv-05875-JGK</b></p> <p style="text-align: center;"><b>John G. Koeltl, presiding</b></p> <p style="text-align: center;"><b>JURY DEMAND</b></p> <p style="text-align: center;"><b>AMENDED COMPLAINT</b></p> <p style="text-align: center;"><b>RELATED: 23-cv-06881-UA</b></p>
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Pro Se Plaintiff D. George Sweigert, files this AMENDED COMPLAINT as a diversity action against defendants Jason Goodman of New York City who operates a DBA (doing business as) known as 21<sup>st</sup> Century 3D and DBA CrowdSource The Truth, his associate and co-conspirator Corean Elizabeth Stoughton of Columbia, Maryland, and Google LLC (“Google”), YouTube, LLC (“YouTube”), ALPHABET, Inc., and Twitter, LLC which has become X CORP, to seek damages in excess of \$75,001.00 USD.

**NATURE OF THE ACTION**

1. This is a civil action for damages against Defendants for violations of various federal and New York State laws. As further articulated in this amended complaint these laws include: Lanham Act, 11 U.S.C. § 1125(a) and Section 1125(a), Federal Trade Commission Act, 15

U.S.C. § 45(a), and the civil right of action of the Computer Fraud & Abuse Act 18 U.S.C. § 1030. Other causes of action include violations of the New York State Privacy Law, Civil Rights Law §§ 50 and 51, trade slander, defamation, common law vicarious liability, and supplement jurisdiction of Indiana State Law.

2. The heart of this action questions whether gigantic social media companies can inconsistently enforce their Terms of Service (ToS), Acceptable Use Policies (AUP) and Trust and Safety policies to reward someone like Defendant Jason Goodman who can claim he has the social media power to coerce federal judges to do his bidding under threat of long-term smear campaigns, like the one directed at federal judge Valerie E. Caproni and the Plaintiff. Note: all such policies of the social media Defendants (ToS, UUA, UAP and similar) are herein explicitly incorporated, referenced and relied upon.

3. Goodman knowingly, using the facilities and means of interstate commerce provided by YOUTUBE.COM and TWITTER.COM (social media Defendants) violated New York Penal Law § 135.60, coercion in the second and third degree, by issuing veiled threats, using intimidation and “if you know what is good for you” warnings to attack Plaintiff, S.D.N.Y. District Judge Valerie E. Caproni and Chief Magistrate James L. Cott.

4. The Goodman objective is to slander, defame, harass and injure the Plaintiff on social media platforms known as YOUTUBE.COM (Google, LLC, YouTube, LLC, ALPHABET, INC.) and TWITTER.COM (Twitter, LLC now X CORP) (social media Defendants).

5. Goodman’s normal mode of social media operations is to intimidate, threaten and coerce certain conduct favorable to Goodman while using the facilities of the social media Defendants. Goodman has accused the Plaintiff of committing crimes and engaging in sexual misconduct in

video podcasts distributing statements of fact that are false and published in a malicious and/or reckless manner across Goodman's twenty (20) plus social media channels.

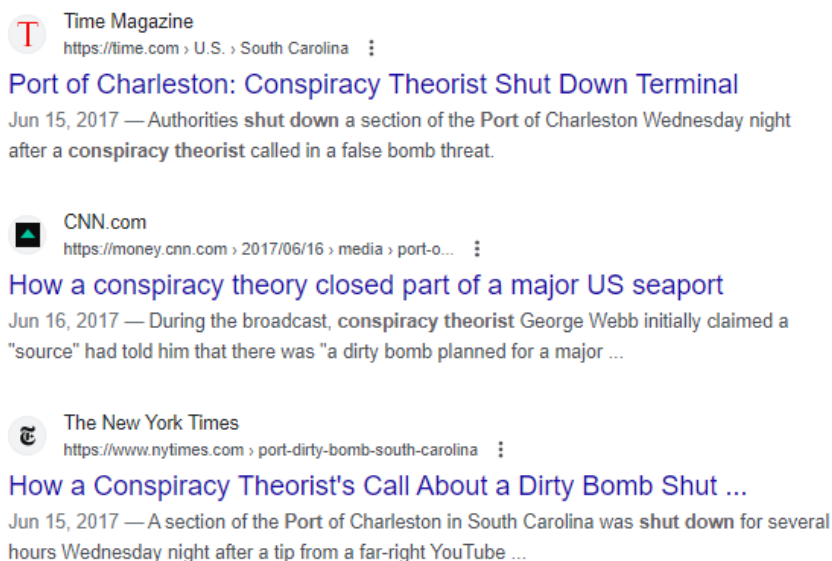
6. Goodman violates "Community Standards" which cause a singular social media account to be suspended or terminated, which Goodman then blames on corrupt judges and courts working with the Federal Bureau of Investigation (F.B.I.) to suppress the U.S. Constitution. To achieve amplification, which can be used to shut down maritime ports, manipulate attacks on judicial institutions and private citizens, Goodman uses various forms of social media manipulation, coordinated via the use of a dozen inauthentic single purpose "hate" accounts under Goodman's control.

7. When a Goodman social media account is suspended or terminated for violations of Trust and Safety policies (ToS/UAP, etc.), Goodman is quick to accuse the Plaintiff (on a dozen occasions) of working with the F.B.I. as a so-called confidential informant "U.C.O.", and working as a U.C.O. with judge Caproni (see Goodman's on-line manifesto TWITTER COUP) to commit acts of treason, punishable by the death penalty.

### ***Power of Social Media Attacks***

8. For background on the danger of such activity, Goodman, published a YouTube live stream video on June 14, 2017 on his YouTube channel "Jason Goodman". The video live stream in question featured the Plaintiff's brother, George Webb Sweigert. Between Goodman and "George Webb", as he is known in social media circles, the two created a drama hysteria similar to the Orson Wells "War of the Worlds" of 1938, replacing Martians with an incoming dirty bomb aboard a commercial container ship. With 2,000 live viewers, Goodman, after announcing and publishing a maritime agency's non-public emergency phone number, and then personally telephoned that number (on air), as did several other viewers, the watch commander

of the U.S. Coast Guard station at the Port of Charleston, South Carolina, who based upon Goodman live stream immediately closed the Port and initiated a full-scale response to a radiation dispersal device (RDD). Goodman made the watch commander aware of a hoax dirty bomb on the Motor Vessel Memphis Maersk, which was at the time docking. The Captain of the Port The video appears at URL: [https://odysee.com/@Crowdsourcethetruth:d/Clear-and-Present-Danger-\(Calm-Before-the-Storm\)--maerskmemphis:5](https://odysee.com/@Crowdsourcethetruth:d/Clear-and-Present-Danger-(Calm-Before-the-Storm)--maerskmemphis:5) As reported in the N.Y. Times, Cable News Network, Associated Press and at least 20 other news services both Goodman and “George Webb” were cited as causing the “dirty bomb hoax”. Estimates are that 50 to 100 emergency personnel responded to the event.



9. The news articles cited above are herein explicitly referenced, incorporated and relied upon.

### ***Goodman and Elon Musk***

10. Plaintiff is informed and believes and, on that basis, alleges that Goodman is intertwined with the principal of X CORP, Elon Musk, and therefore brings this action for damages caused by the direct and contributory tortious behavior of all the Defendants, to include X CORP.

11. As documented in previous litigation (18-cv-08653-VEC-SDA *Sweigert v. Goodman*, SDNY [*GOODMAN I*]) Goodman, via his personal capacity and via use of “doing business as” (DBA) enterprises, has operated countless predatory social media accounts, which have been terminated and banned, and reconstituted in a process known as ban evasion, or the circumvention of account security controls by Goodman.

12. Since the filing of *GOODMAN I* in 2018, Goodman has been busy promoting what he calls his on-line manifesto the “TWITTER COUP” report which is said to implicate federal S.D.N.Y. District Judge Valerie E. Caproni in a criminal conspiracy with the President of the EMMY Awards and that they both is working with the F.B.I. and the Plaintiff to suspend and terminate Goodman’s TWITTER/X and YOUTUBE accounts. As Goodman asserts:

*“Over the past four years, U.S. District Court Judge Valerie Caproni has presided over three cases in which the author was a litigant.*

*(Case 1:18-cv-08653-VEC-SDA, Case 1:20-cv-07269-VEC-OTW, Case 1:21-cv-10627-VEC)”* (All documents related to the TWITTER COUP parts 1, 2, 3 and 4 are herein explicitly referenced and incorporated <https://crowdsourcethetruth.medium.com/the-twitter-coup-ee1336ccd1fa> , December 2022)

13. Hearing that Elon Musk would be at New York City Twitter Headquarters, Goodman released a dozen videos on approximately Halloween 2022 standing outside of Twitter Headquarters passing his TWITTER COUP document to security personnel with a request that said security personnel hand delivery the documents to Elon Musk.

14. For context, X CORP and Elon Musk assumed ownership of Twitter.Com in October 2022. In December 2022 X CORP began deep cuts and lay-offs of personnel, especially in the

Trust and Safety departments, which moderated content for Community Standards violations.

Elon Musk also disbanded the Trust and Safety Council in December 2022.

15. Herein a N.Y. Times article is explicitly referenced and relied upon, *Trump Attacked*

*Me. Then Musk Did. It Wasn't an Accident*, Sept. 18, 2023,

<https://www.nytimes.com/2023/09/18/opinion/trump-elon-musk-twitter.html> and a Verge article

*The Entire Story of Twitter / X under Elon Musk*, Sept. 15, 2023

[https://www.theverge.com/2022/4/11/23019836/elon-musk-twitter-board-of-directors-news-](https://www.theverge.com/2022/4/11/23019836/elon-musk-twitter-board-of-directors-news-updates?ref=wavelengths%2Farchives%2F18)

[updates?ref=wavelengths%2Farchives%2F18](https://www.theverge.com/2022/4/11/23019836/elon-musk-twitter-board-of-directors-news-updates?ref=wavelengths%2Farchives%2F18) and a CNN Business report *Twitter disbands its*

*'Trust and Safety Council' that tackled harassment and child exploitation*

<https://www.cnn.com/2022/12/12/tech/twitter-disbands-trust-and-safety-council/index.html> .

16. During these Twitter lay-offs, Goodman released a dozen video podcasts shaming and slandering the newly unemployed ex-employees of Twitter. Goodman accused them all of treason for attempting to curtail AMENDMENT I to the U.S. Constitution.

17. This goes to the heart of the issue. These social media Defendants (TWITTER.COM and YOUTUBE.COM) that do not comply with their own policies (ToS, UAP, Trust and Safety, etc.) and knowingly enable Goodman, directly and indirectly, to maintain dozens of inauthentic accounts are irrevocably entangled with Goodman's misconduct that violates New York State law as they have provided him material support.

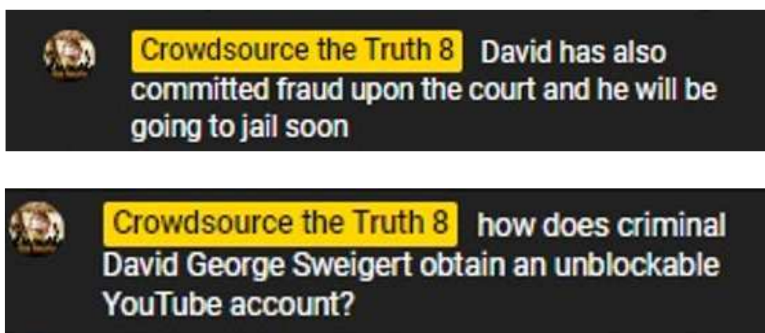
### ***Goodman's Amicus Brief***

18. Prior to the TWITTER COUP, Goodman used the same "fake news" tactics to create an Amicus Brief to slander the Plaintiff, and a federal court employee in Michigan. George Webb Sweigert, Plaintiff's brother, filed a garden variety defamation action in the U.S. District Court

serving Detroit in the Eastern District of Michigan (M.I.E.D.). (20-cv-12933-GAD-KGA, Sweigert v. C.N.N. [*WEBB I*]).

19. Goodman filed an “Amicus Brief” in that Michigan action (*WEBB I*) accusing the Plaintiff of using his skills as a Certified Ethical Hacker to hack the E.C.F. court docket and conspire with George Webb and a M.I.E.D. employee Richard Loury to file fraudulent documents on the E.C.F. docket. Goodman continuously repeats to this day that the Plaintiff filed fraudulent documents in the M.I.E.D. action and violated his Oath of Conduct required of Certified Ethical Hackers and should be in prison for 17 years. The Plaintiff apparently committed these criminal acts at the behest of the F.B.I. and/or judge Caproni or the President of the EMMY Awards to “silence Goodman”. To this point the Plaintiff explicitly incorporates and relies upon the Department of Justice Office of Inspector General Report on F.B.I. U.C.O.s, Audit 23-012, December 2022. *Audit of F.B.I.’s National Security U.C.O.s.* ( <https://oig.justice.gov/sites/default/files/reports/23-012.pdf> ).

20. The Amicus Brief in *WEBB I* is listed as ECF 20, 07/20/21, [STRICKEN] AMICUS CURIAE BRIEF by Jason Goodman (DPer) Modified on 3/21/2022 (TMcg). The brief is explicitly referenced, incorporated and relied upon. ( <https://trackingmeroz.files.wordpress.com/2022/01/george-webb-sweigert-vs-cnn-doc-20-720-2021.pdf> )



21. The Plaintiff herein explicitly references all “chat” communications, as shown above, that makes reference to the Plaintiff on the YouTube channel “CrowdSource The Truth 8”.

22. As a result of the non-stop and continuous trade libel and slander (defamation per se) concerning “forged court documents”, the Plaintiff filed an action in the M.I.E.D. court against Goodman’s company Multimedia System Design, Inc., which has been transferred on 08/06/2023 to the S.D.N.Y. as 23-cv-06881-UA, *Sweigert v. M.S.D.I.* (incorporated by reference). The Plaintiff relied on the original M.I.E.D. in *Sweigert v. M.S.D.I.* to prepare this legal action. Goodman has claimed in social media podcasts that M.S.D.I. is an inactive entity, but Goodman is the sole owner and stockholder.

23. Goodman claims that his recurring social media announcements of his on-line criminal investigations provide proof that the Plaintiff is guilty for filing forged court documents and deserves a 17-year prison sentence. This is taken to mean that Goodman fancies the use of a biased group-based information evaluation and credibility assessment. Goodman has replaced the authority of several judicial decisions by many jurists (e.g. Judge Gershwin Drain, M.I.E.D.) with the “wisdom of the crowd” to convict the Plaintiff in Goodman’s own unique court of public opinion, as “all the courts are corrupt”.

24. The following decisions of Judge Gershwin Drain, M.I.E.D., are herein explicitly referenced, incorporated and relied upon: ORDER Enjoining Defendant from Contacting Court Personnel and Family, Requiring Defendant to Show Cause why he should not be Sanctioned and Scheduling Show Cause Hearing, 2/11/2022, ECF 12, *George Webb Sweigert v. Jason Goodman*, 2:22-cv-10002-GAD-KGA, M.I.E.D. and OPINION and ORDER ... Striking Non-Party Jason Goodman's [20] Amicus Curiae Brief, 3/21/2022, ECF 60, *George Webb Sweigert v. C.N.N.*, 2:20-cv-12933-GAD-KGA (*WEBB I*).



25. Thus his “crowd’s” wisdom supports Goodman’s deceptions and falsity of the claims he broadcasts to thousands on social media. This is a technique engineered and refined by Goodman mentor conspiracy theorist Alex Jones (see below on a simulcast of each other’s social media shows).



26. In short, TWITTER.COM and YOUTUBE.COM are now unsafe places filled with disinformation, intimidation and threats that impact the well-being of Goodman’s targets. Like Dorothy’s dog Toto pulling back the curtain concealing the true nature of grand and glorious Wizard of Oz, Goodman hides behind his social media persona of “crowdsourcing”.

### ***Ban Evasion***

27. Since 2018 Goodman has had at least eleven (11) accounts terminated by YOUTUBE.COM and seven (7) accounts terminated by TWITTER.COM that should have resulted in life time bans on those platforms. In each case, Goodman merely restarts his activities with pre-existing passive accounts created with false names that are then renamed to CrowdSource The Truth 1, 2, 3, 4, 5, 6, 7 and now in the present instantiation CrowdSource The Truth 8 and 9. An equal number of TWITTER.COM accounts have been terminated with Goodman creating new renamed accounts the very next day. This activity is referred to as “ban evasion”.

28. Ban evasion is a popular circumvention strategy that malicious users frequently adopt. Ban evasion is the act of circumventing suspensions on an online platform, wherein banned users create another account to continue their activities on the platform. Ban evasion involves creating a new account strictly after the previous account has been banned for malicious behavior, a practice employed by Goodman. Supposedly, the social media Defendants prohibit ban evasion, but this is not the case. They appear to condone it.

29. The ban evasion lifecycle starts with the banning of a malicious account (the “parent” account) to limit harm to the online community. During evasion, this is followed by the account owner creating a new account (the “child” account) to bypass the ban, often to continue abusing community member(s), vandalizing the platform, or engaging in other malicious activities, the act of creating the child account is ban evasion. The child account also engages in malicious behavior and is eventually detected and banned from the platform or community. The three key stages of the ban evasion lifecycle are: banning of parent account, creation of child account, and banning of the child account. It is alleged that Defendant Goodman has engaged in such “child account” creation over 25 times (combined platforms).

30. Both YOUTUBE.COM and TWITTER.COM (social media Defendants) employ Trust and Safety departments to enforce User Acceptance Agreements (UAA) (aka Terms of Service [TOS] agreements) or Acceptable Use Policies (AUP) that define community standards for the online platform. However, individuals like Goodman, working with co-Defendant Corean Elizabeth Stoughton, can create new bogus e-mail accounts, use Virtual Private Networks and other “masking” techniques to appear as a new or different user. Both social media Defendants are aware and knowledgeable of Goodman’s technical ban evasion tactics.

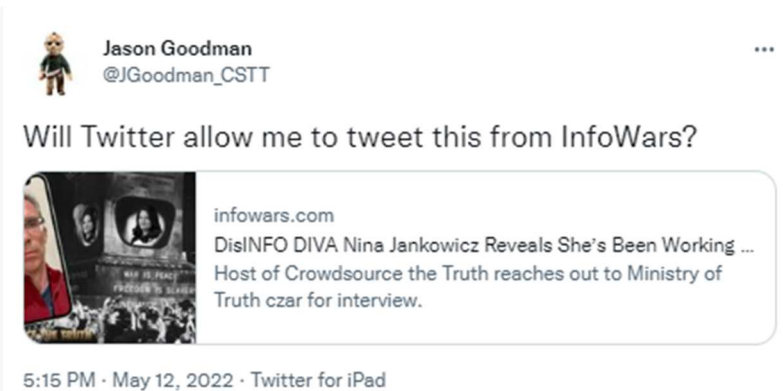
31. Both TWITTER.COM and YOUTUBE.COM ToS/UAAAs clearly state that once an account is terminated that particular individual is banned from their platform for life and cannot merely repurpose another account to continue content distribution. Although informed on a dozen occasions of Goodman's ban evasions and repurposed accounts TWITTER.COM (X CORP.) and YOUTUBE.COM have taken no action to enforce their Trust and Safety requirements as articulated in the TOS/UAA/UAP and in suspension notices sent to the user (Goodman).

32. Goodman filed an action to sue the Plaintiff and several others for supposedly communicating with YOUTUBE.COM and TWITTER.COM about violations of community standards that resulted in account terminations. (see 21-cv-10878-AT-JLC *Goodman v. Bouzy et al*, SDNY [*GOODMAN 2*]). In that action (*GOODMAN 2*), the Plaintiff Sweigert was a co-Defendant with Nina Jankowicz, a former employee of the U.S. Department of Homeland Security (D.H.S.). Ms. Jankowicz has a permanent protection restraining order against Goodman after he telephoned her residence on numerous occasions and directed a dozen social media messages at her and her new born. That Commonwealth of Virginia (issued in Alexandria) restraining order is explicitly referenced, incorporated herein and relied upon.

[https://twitter.com/JGoodman\\_CSTT](https://twitter.com/JGoodman_CSTT)



33.



34. Goodman has also brought legal actions against others for the same issues – account terminations (21-cv-10627-VEC *Goodman v. Sharp et al*, SDNY [*GOODMAN 3*]). Another co-

Defendant in *GOODMAN 2* was the President and C.E.O. of the EMMY AWARDS, Adam Sharp, who Goodman had sued in a previous action, *GOODMAN 3*.

35. To this end, the ORDER of the presiding judge in *GOODMAN 2*, published as ECF 238, Jun 28, 2023, ORDER ADOPTING REPORT AND RECOMMENDATION, is explicitly referenced and relied upon. Likewise, the ORDERs of the presiding judge in *GOODMAN 3*, are explicitly referenced and relied upon, ECF 72, 07/12/2022 MEMORANDUM OPINION AND ORDER and ECF 76, 09/06/2022, ORDER.

### **PARTIES**

36. Defendant YouTube, LLC is a Delaware limited liability company with its principal place of business in San Bruno, California. YouTube, LLC is a wholly owned and controlled subsidiary of Defendant Google LLC (“Google”), a Delaware limited liability company with its principal place of business in Mountain View, California, and a place of business in the State of New York and this District. Defendants operate a website called “YouTube,” located at [www.youtube.com](http://www.youtube.com), one of the most prominent and popular websites on the Internet. Google exercises substantial and continuing control over the continuing acts of YouTube that form the subject matter of the claims against YouTube.

37. Defendant ALPHABET, INC. is a Delaware corporation with its headquarters and principal place of business at the “Googleplex” in Mountain View, California. In or around 2017, Google changed from a corporation to a limited liability company (LLC) under the umbrella of Alphabet, Inc.

38. TWITTER.COM is operated by Defendant X Corp. a corporation organized and existing under the laws of the State of Nevada, with its principal place of business in San Francisco, California. X Corp. is successor in interest to Twitter, Inc. X Corp. provides the X service

(“X,” formerly referred to as Twitter). X is a real-time, open, public conversation platform. X Corp. is registered with New York State as a foreign business corporation. At all times relevant to this action, Twitter has been leasing commercial office space located at 245-249 West 17th Street, New York, NY 10011.

39. Jason Goodman operates a confederation of social media accounts under a trademark CROWDSOURCE THE TRUTH. (<https://www.trademarkelite.com/trademark/trademark-detail/87752970/CROWDSOURCE-THE-TRUTH>). Goodman maintains his business address at 252 7<sup>th</sup> Avenue, Apartment 6 S, New York, N.Y. 10001.

40. Jason Goodman is presently the subject of a pre-filing order issued in 20-cv-07269-VEC-OTW *The National Academy of Television Arts and Sciences, Inc. et al v. Multimedia System Design, Inc.* [GOODMAN 4] and in GOODMAN 2.

(<https://dockets.justia.com/docket/circuit-courts/ca2/22-592>), herein explicitly incorporated and relied upon. This action was appealed and heard by the U.S. Court of Appeals for the Second Circuit as docket no. 22-592, Judgment Mandate against Goodman issued 09/13/2023 (this decision incorporated in its entirety by reference). He presently owes an amount of an almost \$1,500.00 in costs.

41. Plaintiff. At all times described herein, the Plaintiff is a *pro se* non-attorney layman that has suffered Article III injuries and damages and seeks redress in the federal courts. Plaintiff has suffered the dilution of his career in the emergency medical services and the emergency management field as a direct result of the activities of the Defendants. Plaintiff is a private figure. Plaintiff, an Honorable Discharged U.S. Air Force veteran, holds two masters’ degrees, is a licensed Emergency Medical Technician, a licensed ham radio operator, who became a Certified Ethical Hacker (U.S. Department of Defense cyber defense program (DoD 8570.01-

Manual)) and is a Certified Emergency Management Specialist conferred by the National Association of Safety Professionals. Plaintiff has self-published a dozen white papers on cyber security of critical infrastructure as well as the book “*Certified Ethical Hackers Field Operations Guide*”. Plaintiff’s professional reputation and business opportunities in the field of cyber emergency response have all but been destroyed by Goodman’s fraudulent transmission of his hoax news videos that accuse the Plaintiff of criminal activities that are a breach of the Codes of Conduct of several of his professional certifications.

### **JURISDICTION AND VENUE**

42. . This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. § 1332(a), as there is complete diversity between the Parties and the amount in controversy exceeds \$75,001. This Court also has jurisdiction over this proceeding under 28 U.S.C. §§ 1331 and 1367(a), as this Complaint asserts a claim arising under the laws of the United States and the remaining claims asserted by the Plaintiff form part of the same case or controversy under Article III of the United States Constitution.

43. Venue is proper in this judicial district pursuant to 28 U.S.C. §1391(b) because a substantial part of the acts, events, and omissions giving rise to Plaintiff’s claims occurred in this judicial district, and because X Corp. and Google, LLC both maintain business offices in this judicial district.

### **FACTUAL ALLEGATIONS**

44. As stated in several previous S.D.N.Y. actions Goodman believes his publishing “empire” is his legitimate business that he operates for commercial profit. Goodman conceded that he has hijacked the term of art “crowdsourcing” and has trademarked the name “CrowdSource The Truth” to label his video podcasts and tweets, as well as his own personal

channels and other illegitimate proxy social media identities and channels (to confuse the public). “Crowdsourced” is Goodman’s claimed editorial process. Goodman claims that he is “crowdsourcing” or vetting information which is a false commercial and business claim.

45. “Crowdsourcing” is misused by Goodman to create the false representation that there is some kind of editorial process at work. There isn’t. Goodman’s non-existent “crowdsource” editorial process provides no actual vetting. The phrase is used by Goodman as a cloak to his intent and motives to recklessly publish false statements with actual malice.

46. Goodman fancies himself as a “WE THE PEOPLE” citizen grand jury and has published dozens of videos entitled CITIZEN GRAND JURY, where Goodman “records” indictments against federal judges for treason. Goodman believes this grand jury concept allows him to conduct on-line criminal investigations and produce verdicts to label persons criminals like the Plaintiff and various federal judges (like Hon. Gershwin Drain).

47. Goodman’s social media expressions are carefully coordinated between TWITTER.COM and YOUTUBE.COM in a cross-promotional technique in a “one hand washes the other” style to amplify his allegations of criminality to a broader reach.

48. Goodman has published statements that directly and indirectly defame and slander the Plaintiff using his full legal name, first and last name, first name, “George Webb’s brother”, “Stupid Mario Luigi” and other terms that identify the individual Plaintiff.

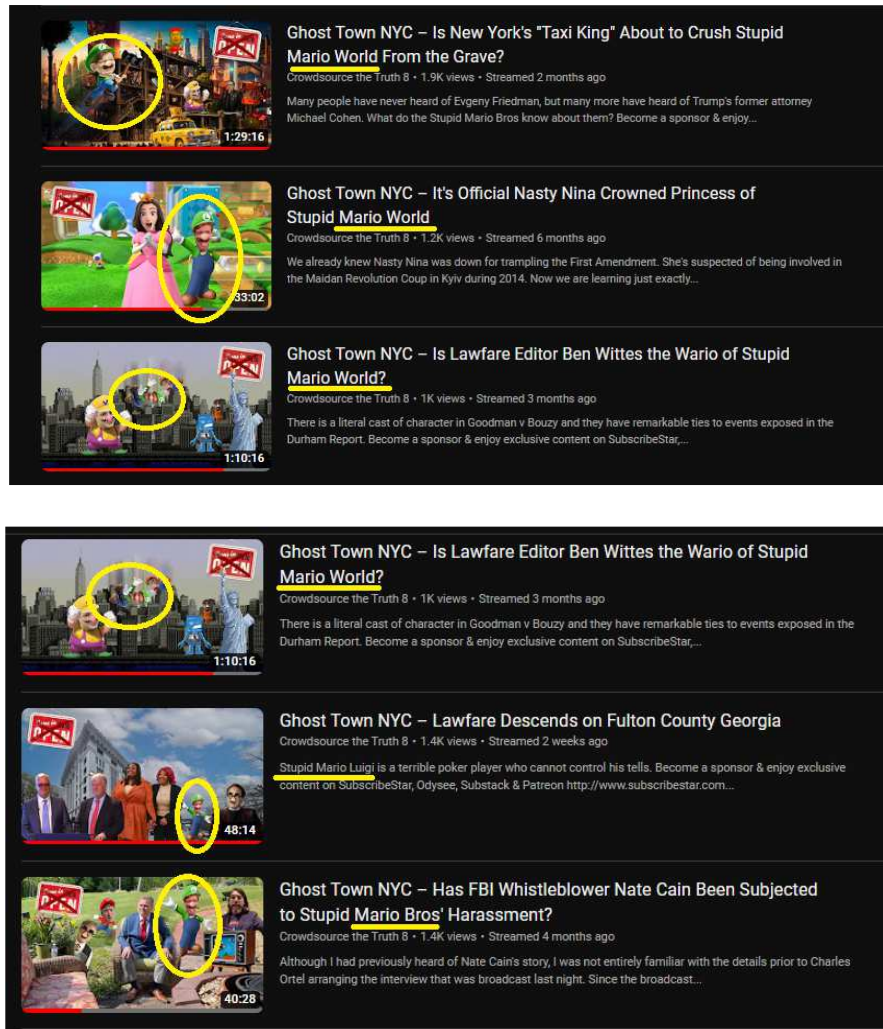
49. Goodman’s slander and trade libel are directed at one specific person, the Plaintiff. These false remarks have had a negative impact on the Plaintiff’s reputation, his publishing revenues and his volunteer activities. Goodman publishes his remarks as facts, not opinion, and they demonstrably false. Goodman’s actions constitute trade libel and defamation per se.



50. The Plaintiff has requested retractions on dozens of occasions, only to be ignored by Goodman and name called in e-mail messages.

51. Pictured below are three of Goodman YOUTUBE channels, CrowdSource 8 (@crowdsourcethetruth8954) and 9 (@crowdsourcethetruth9) and Ghost Town NYC (@GhostTownNYC). All three channels carry identical content. A representative example of Goodman's social media posts orbits his COUNTER LAWFARE reports featuring Plaintiff Sweigert as STUPID MARIO LUIGI as shown below:

<https://www.youtube.com/@crowdsourcethetruth8954/search?query=mario>



52. Below is an example of a terminated YOUTUBE account known as CrowdSource The Truth 5.



[Crowdsource the Truth 5](#)

Crowdsource the Truth 5

10K subscribers

SUBSCRIBED

Webb of lies falls apart as "David v Goliath" CNN case gets dismissed six ways to Sunday.

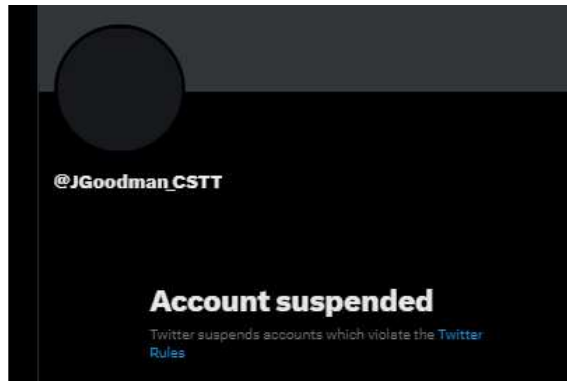
53. Goodman holds Twitter account @JG\_CSTT and also publishes cartoons of the undersigned's father on Twitter as "@GHenryDickFace", in an attempt to disgrace the military service of George H. Sweigert, Staff Sergeant, U.S. Army with service in World War II, in violation of Indiana State law.

<https://twitter.com/GHenryDickface>



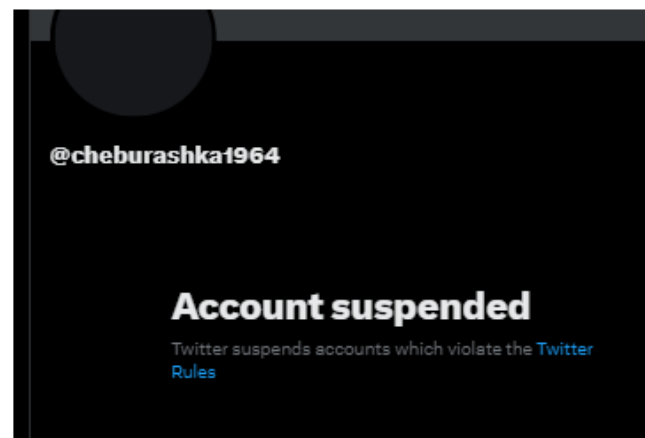
54. All tweets made from the GHenryDickface Twitter / X Corp. account are hereby incorporated by reference and explicitly relied upon herein.

55. Below is a representative example of Goodman's banned TWITTER accounts.

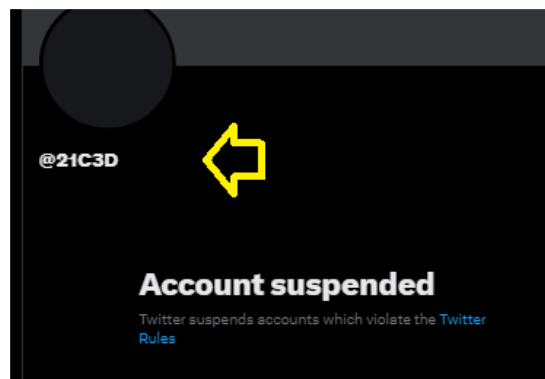


[https://twitter.com/JGoodman\\_CSTT](https://twitter.com/JGoodman_CSTT)

56. Below are other examples of suspended Twitter accounts used by Jason Goodman.



<https://twitter.com/cheburashka1964>

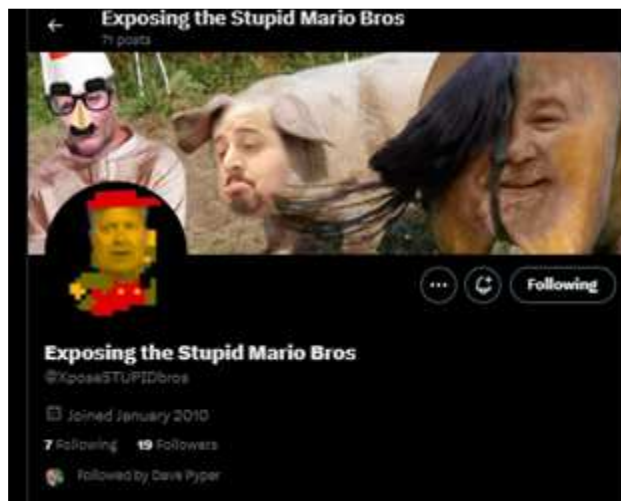


<https://twitter.com/21C3D>

57. Below are other examples of Twitter accounts used by Jason Goodman.



<https://twitter.com/spoliat1>



<https://twitter.com/XposeSTUPIDbros>

58. Below is another example of another Twitter account used by Jason Goodman, which is currently “frozen”, no uploads or “tweets” allowed.



### **GENERAL ALLEGATIONS**

59. Plaintiff reserves the right to raise additional and other affirmative defenses that may subsequently become or may appear upon information and belief to be applicable to these allegations.

60. It is alleged that the Twitter aka X CORP Community Guidelines are routinely violated by Goodman (<https://help.twitter.com/en/rules-and-policies/x-rules>). To name a few examples:

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Abuse/Harassment: You may not share abusive content, engage in the targeted harassment of someone, or incite other people to do so

Hateful conduct: You may not attack other people on the basis of race, ethnicity, national origin, caste, sexual orientation, gender, gender identity, religious affiliation, age, disability, or serious disease.



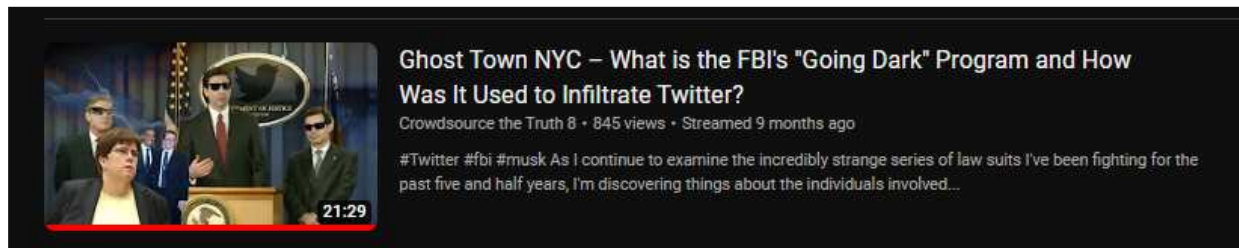
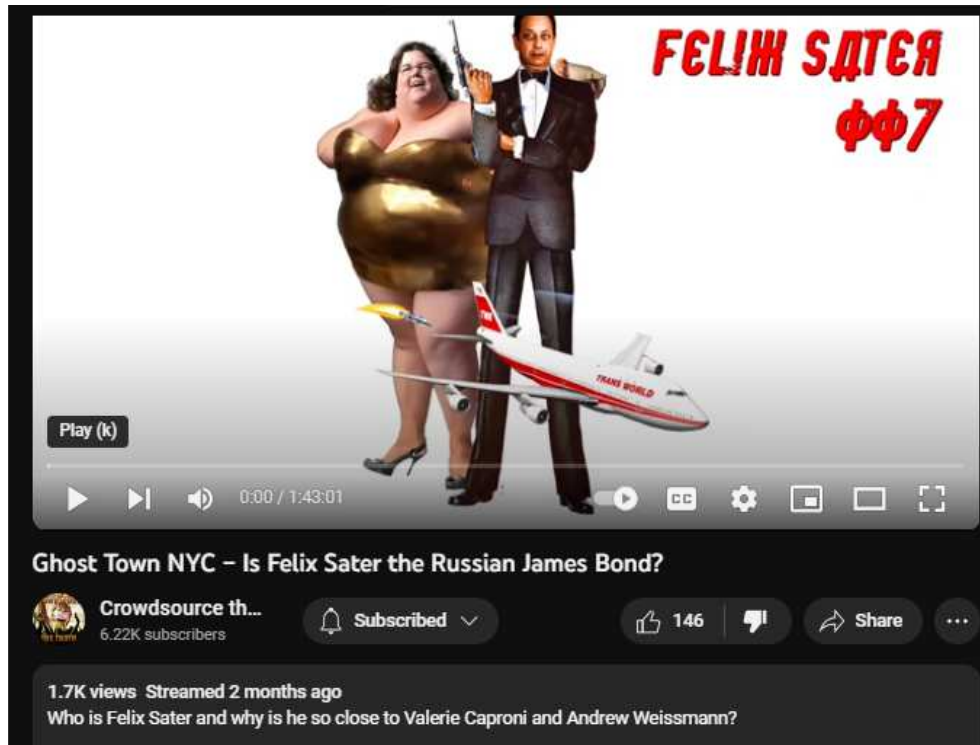
Private Information: You may not publish or post other people's private information (such as home phone number and address) without their express authorization and permission. We also prohibit threatening to expose private information or incentivizing others to do so.

Platform Manipulation and Spam: You may not use X's services in a manner intended to artificially amplify or suppress information or engage in behavior that manipulates or disrupts people's experience on X.

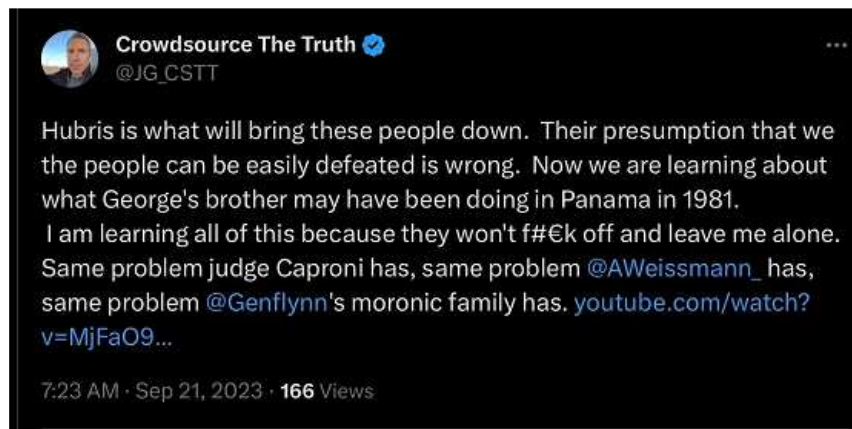
Misleading and Deceptive Identities: You may not impersonate individuals, groups, or organizations to mislead, confuse, or deceive others, nor use a fake identity in a manner that disrupts the experience of others on X.

61. The Terms of Service of both social media Defendants, to include the X Corp Ban Evasion Policy and Permanent Suspensions, the YouTube policy on Community Standards and Terminations, and all policies of both social media Defendants concerning accounts involved in circumventing ban evasion security are herein explicitly referenced, incorporated and relied upon.

62. Goodman, acting in his personal capacity and as agent for the CrowdSource the Truth (CSTT) enterprise, has stated many times in video broadcasts that the CSTT enterprise must be protected from persons like the Plaintiff who represent a "threat" to the U.S. Constitution and the American way of life. To this end Goodman uses the CSTT enterprise to push the "COUNTER LAWFARE REPORT" to accuse the Plaintiff of criminal acts. Thus, Goodman published predatory videos to criminalize the Plaintiff with corrupt judge to include Valerie E. Caproni and federal magistrate James L. Cott who, Goodman claims, are covertly destroying the administration of justice by plotting against Goodman. A representative sample of such a video is shown below and all videos that referenced Valerie E. Caproni and James L. Cott by Goodman are herein explicitly referenced, incorporated and relied upon.



Judge Caproni pictured above in representative sample of Goodman's videos



Above is typical Goodman's tweet that links judge Caproni.



63. CrowdSource The Truth (aka Defendant's enterprise) is a for profit racketeering enterprise that is promoted as a "fact checking service" that is engaged in "conducting investigations" and gathering evidence for "criminal prosecutions". This "business" relies on advertising pay-for-view videos on many non-revenue producing social media sites such as Rumble, BitChute, YouTube to distribute general public relations and awareness for the profit producing sites known as Patreon, SubScribeStar and Odysee.

<https://www.subscribestar.com/crowdsourcethetruth> ,

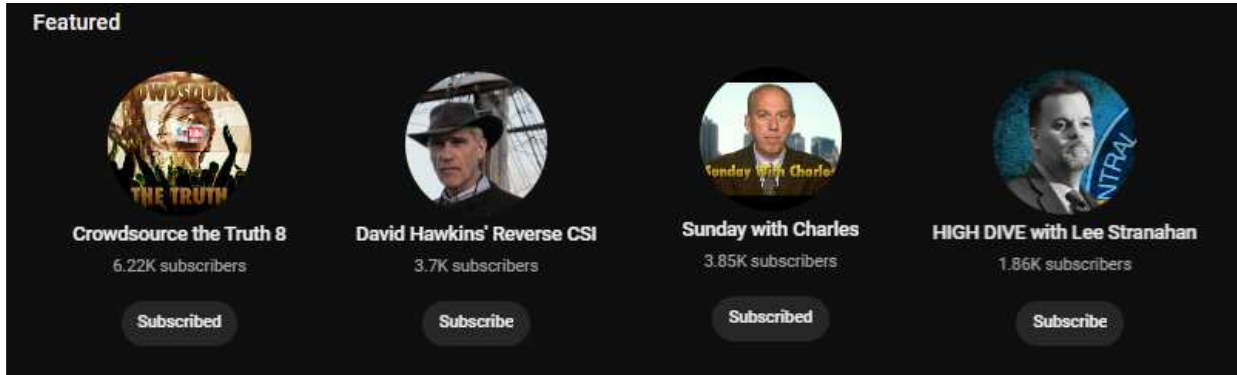
<https://www.patreon.com/crowdsourcethetruth> ,

<https://odysee.com/@Crowdsourcethetruth:d?view=membership>

64. Goodman routinely uses 21<sup>st</sup> Century 3D, CrowdSource The Truth and his personal capacity to violate the terms of service of social media providers while discharging his duties as an agent for 21<sup>st</sup> Century 3D and himself which have led to the suspension and/or termination of several social media accounts controlled by Goodman and/or 21<sup>st</sup> Century 3D. To this end, Goodman maintains proxy accounts to work around account bans and terminations (aka ban evasion) on a myriad of electronic Internet servers, collectively known as the CrowdSource The Truth CSTT enterprise (aka the Defendant's CSTT enterprise, the collective of inauthentic social media proxy accounts co-mingled with supposed "legitimate" accounts"). Caveat: Plaintiff is aware that Defendant Goodman presently maintains at least four (4) active Twitter accounts: <https://twitter.com/csthetruth> (frozen), [https://twitter.com/jg\\_cstt](https://twitter.com/jg_cstt) , <https://twitter.com/XposeSTUPIDbros> , <https://twitter.com/GHenryDickface> and <https://twitter.com/spoliat1> .

65. Goodman conspired with others to violate the Computer Fraud and Abuse Act by creating inauthentic e-mail accounts that could be used to obtain new ban evasion accounts to

circumvent ban evasion security controls. Goodman conspired with Charles Ortel, Lee Stranahan to create Youtube.Com accounts that display identical content to his CrowdSource The Truth channels. To include: <https://www.youtube.com/@sundaywithcharles8140> , <https://www.youtube.com/@highdivewithleestranahan2872> and <https://www.youtube.com/@davidhawkinsreversecsi224>



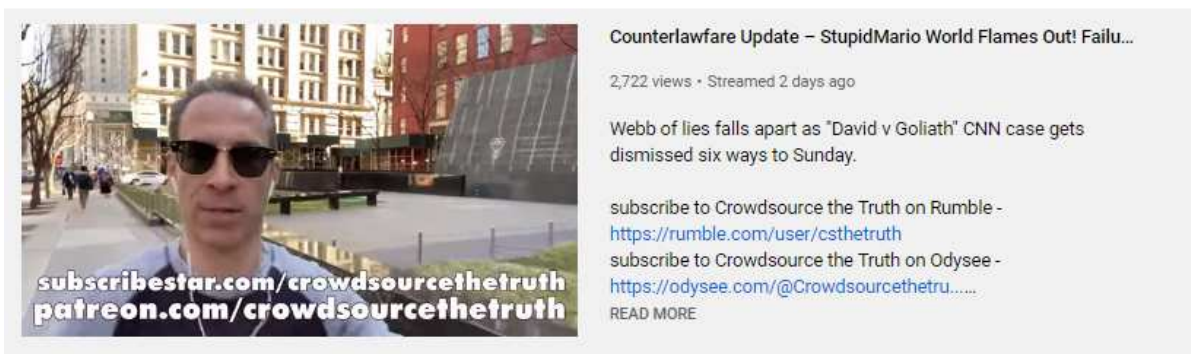
66. These Goodman accounts (see above) are instantiations of Goodman masquerading as Ortel, Stranahan and Hawkins, in an attempt to circumvent the practical effects of a ban evasion.

67. To raise money from unsuspecting New York consumers Goodman uses a two staged approach. There is a (a) public advertising component which redirects viewers to pay-for-view social media sites and (b) the private pay-for-view Internet accessible web-site open to viewers user authentication fee is paid (see subscriber / membership basis). The broadcasts to the public (stage one) serve as a solicitations and advertising (false advertising) acting as promotional device (analogous to a book cover or book wrapper), while the for-profit subscriber content is private (stage two) (analogous to viewing the actual book content), only available to a viewer after a recurring credit card payment schedule is established (e.g. \$10.00 a month). The private (stage two) video service allows Goodman to slander and defame his targets behind a so-called

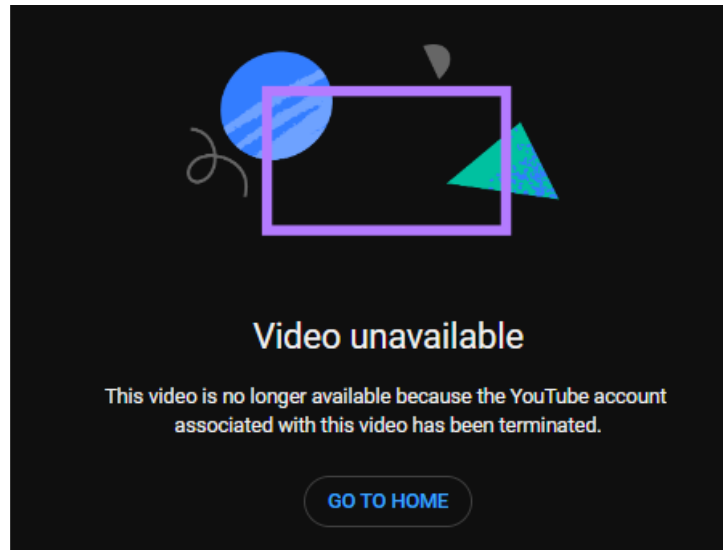
credit card “paywall”. Each public advertising video displays a solicitation from the view to visit pay-per-view web-sites such as SubscribeStar.com and Patreon.com (see below).



30. YOUTUBE.COM, RUMBLE.COM and other publicly accessible social media sites (stage one) are used by 21<sup>st</sup> Century 3D and/or Goodman to solicit (false advertising) memberships to credit card holders (stage two) with an enticement to obtain authenticated user accounts on PATREON, ODYSEE and SUBSCRIBESTAR (stage two) Internet pay-per-view sites.



<https://www.youtube.com/watch?v=qTuXPFoZERk>



<https://www.youtube.com/watch?v=qTuXPFoZERk>

***Unfair Trade Practices and Business Libel by the Defendant's CSTT Enterprise***

68. Whether they are public (stage one) advertising announcements (false advertising) and private credit card (stage two) podcasts, Goodman, who with actual malice, spreads smears of criminal conduct, mental illness, accusations of grotesque behavior, etc. against the Plaintiff (and others) that are materially false to generate interest in his broadcasts.

69. New York consumers that watch these CSTT stage one enticements (false advertising) to subscribe, and who actually do subscribe to pay-for-view channels with credit cards are being defrauded. These New York consumers expect to review and watch a "fact checking service" that is fact based. Thus, when Goodman defames individuals like Plaintiff, the public assumes and expects that the allegations pushed by Goodman are true. They are not, but they do help coalesce cyber lynch mobs, or as Goodman calls them his "Cyber Militia", to attack the Plaintiff, or Plaintiff's brother George Webb Sweigert.

70. Commencing in July 2021 and continuously occurring to the present, Defendant in his personal capacity and using 21<sup>st</sup> Century 3D's Goodman, has maliciously published fact statements regarding a criminal conspiracy (defamation by implication) about the Plaintiff.

71. Below are recent examples (January 2023) of Goodman's Twitter "tweets" via various Twitter accounts controlled by himself or 21<sup>st</sup> Century 3D.



<https://twitter.com/GHenryDickface/status/1588618185498296320>



<https://twitter.com/GHenryDickface/status/1588618544660742144>



<https://twitter.com/spoliat1/status/1609706501727465474>



<https://twitter.com/spoliat1/status/1609704685375737856>



<https://twitter.com/spoliat1/status/1609704392512372737>

72. Goodman has stated in a dozen videos that he is “protecting” the CrowdSource The Truth enterprise with the COUNTER LAWFARE REPORT. Thus, Goodman, acting as an agent for the CSTT enterprise, makes false police reports and associated defamatory statements as part of discharging his duties as a corporate agent for the CSTT racketeering enterprise.

73. Goodman, as an agent of the CSTT enterprise and in his personal capacity, has been engaging in unfair trade practices and illegal consumer practices which have resulted in injuries and damages to the Plaintiff in excess of \$75,001.00. Such damages have been caused, in part, by Goodman’s filing of maliciously fictitious police reports with the Detroit Police Department and F.B.I. about the Plaintiff and his brother – George Webb.

74. As the Plaintiff owns certain invaluable intellectual property rights, including all rights of publicity associated with the Plaintiff’s education, career reputation and professional



persona. The Plaintiff has published numerous white papers, articles and treatises on ethical hacking, network security, emergency management, protection of critical infrastructure, etc.

75. To this end, prior to the Defendant's reckless attacks on Plaintiff's professional reputation, the Plaintiff enjoyed a professional reputation on the Internet as a Certified Ethical Hacker and technical publisher. The Plaintiff's name, photograph and likeness have tremendous value, in particular to the industries associated with cyber security infrastructure protection aka "network security" and "ethical hacking", etc.

76. Goodman publishes damaging remarks about the Plaintiff and his abilities as a Certified Ethical Hacker, stating that Plaintiff is unfit for such a position as well as conduct rising to the level of criminality.

77. Defendant Goodman acting as an agent for 21<sup>st</sup> Century 3D (CSTT enterprise) and in his personal capacity has maliciously published materially false statements with malice concerning the professional competency and abilities of the Plaintiff who is a Certified Ethical Hacker. Goodman, acting as an authorized agent, has published a dozen social media videos accusing the Plaintiff of criminal participation in a conspiracy with George Webb to docket forged legal documents in a federal court.

78. According to Goodman, Plaintiff's document known as the *Certified Ethical Hackers Field Operations Manual* provides a blueprint for created illegal forged documents using Adobe Acrobat .PDF files. Such statements published by the Defendant in the CSTT (Goodman acting in his official and personal capacities) were made with actual malice and are of no legitimate interest to the public, rather they are part of an on-going smear campaign developed by disinformation professionals. These unprivileged statements made with actual malice of Plaintiff's supposed criminal conduct have resulted in special harm to the Plaintiff's

business, technical and professional reputation. Further, each and every time Goodman has a technical glitch with his social media podcast equipment, he is quick to implicate “that ethical hacker”.



[https://twitter.com/JGoodman\\_CSTT/status/1504943754221965317?ext=HHwWisC-1d6X0eIpAAAA](https://twitter.com/JGoodman_CSTT/status/1504943754221965317?ext=HHwWisC-1d6X0eIpAAAA)

79. The Plaintiff’s likeness, name, image and persona (violation of right to privacy) have been used as part of a long-term false advertising campaign since at least one year ago by a so-called “fact checking service” provided by CSTT to lure and entice New York consumers to the Defendant’s “pay-wall” videos available at PATREON, ODYSEE and SUBSCRIBESTAR.

80. Defendant 21<sup>st</sup> Century 3D / Agent Goodman and/or Goodman personally, have acted in an extreme and outrageous manner with actual malice to accuse the Plaintiff of criminal conduct under a false advertising campaign relying on wire fraud resulting in professional disparagement.

81. The Defendants CSTT enterprise (21<sup>st</sup> Century 3D) using Goodman’s agency have, in the preceding twelve (12) months, acted with actual malice and added a slander against the Plaintiff of criminal conduct related to the publishing of a PDF court document.





[https://twitter.com/JGoodman\\_CSTT/status/1504954872273285126?cxt=HHwWjMC9zfKelUpAAAA](https://twitter.com/JGoodman_CSTT/status/1504954872273285126?cxt=HHwWjMC9zfKelUpAAAA)

82. Videos distributed via social media by the Defendant’s CSTT enterprise assert that “investigations” are conducted as a COUNTER LAWFARE initiative to **protect** the CSTT from “Deep State” operatives using the legal system to quench “journalist endeavors”. COUNTER LAWFARE is another hoax and scam that is maliciously published with the intent to defraud the public in reckless disregard of the truth for deceptive purposes (see “*Crowdsourc The Truth is an Open Source Fact Checking "Truth Engine"*” at <https://www.patreon.com/crowdsourcethetruth>).

83. The intentional and fraudulent misrepresentations by Defendant’s 21<sup>st</sup> Century 3D enterprise, with Goodman at the helm, include “investigations” into the background of individuals to “expose” “Deep State” affiliations, and that such private “facts” are then vetted by the “crowd” for substantiation and used to claim law enforcement arrests are forthcoming

after Goodman files maliciously fictitious police reports (see Detroit Police Department and Detroit F.B.I. field office meetings).

### **SPECIFIC ALLEGATIONS**

#### **FIRST CAUSE OF ACTION**

##### **Misappropriation of Right of Publicity Against Defendant**

##### **Violation of New York State Privacy Law, Civil Rights Law §§ 50 and 51**

84. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 83, inclusive, as if fully restated herein.

85. The 21<sup>st</sup> Century 3D enterprise via it's agent Goodman, and Goodman in his personal capacity, as alleged hereinabove, under the CrowdSource The Truth trademark, constitutes a knowing and unauthorized use of the Plaintiff's name, likeness, photograph and name for commercial purposes, which have substantial commercial value. Defendant's CSTT enterprise used Plaintiff's name, photograph, and likeness knowingly and deliberately, without the prior consent of the Plaintiff. Plaintiff has suffered actual damages as a result of Defendant's CSTT enterprise deliberate use of his names, photograph, and likeness on advertisements and other types of solicitations for goods or services (e.g. promotion of PATREON subscriptions). Defendant's CSTT enterprise engaged in outrageous conduct, carried on with willful and conscious disregard of the rights of Plaintiff. Each such use was unequivocally and directly for purposes of advertising or selling or soliciting purchases of subscription services by Goodman, 21<sup>st</sup> Century 3D such that prior consent was required.

86. As set forth more fully above, Defendant's CSTT enterprise is based around harassment campaigns against the Plaintiff and other like situated individuals creating content around the use of Plaintiff's name, photograph, picture, portrait and/or likeness, to solicit patronage by

their fans. Defendant's CSTT enterprise most lucrative use of Plaintiffs' name, photograph, picture, portrait and/or likeness, appears to be through Defendant's CSTT enterprise podcast, on PATREON, wherein Defendant solicits fees from their "patrons" or fans, to access their podcasts, which are principally based on using Plaintiffs' name, photographs, pictures, portraits and/or likenesses, as punching bags, and the basis of their shows, and the content therein.

87. Defendant's CSTT enterprise used Plaintiff's name, photograph, picture, portrait and/or likeness in numerous ways, to advertise, solicit, and promote their business to tens of thousands of listeners, fans, and consumers; and on a variety of formats, and popular digital platforms, including, but not limited to: PATREON, Facebook, YouTube, Twitter, Periscope, Bit-Chute, SubscribeStar, and countless others.

88. In sum, this is considered "click-bait", or the use of a persona's persona to attract viewers to "click" on the podcast advertisement thumbnail (displayed in Google, LLC and YouTube, LLC search results). The Plaintiff had no relationship to these advertisements in disguise that proclaim viewers should become "patrons" via the PATREON.com, ODYSEE.com and/or SubscribeStar.com "pay-walls", or metered video content that requires pre-payment via credit card by subscribers.

89. Defendant's CSTT enterprise operating at the direction of Goodman, under the CrowdSource The Truth trademark, have made purely profit driven commercial video content, transmitted over the Internet wires, with the Plaintiff's likeness available on the PATREON, Odysee and SubscribeStar podcast subscription credit card "pay for view" website. Such commercial content that attempts to establish a non-existent relationship with the Plaintiff does not qualify for the newsworthy privilege exemption.

90. All of these tortious video productions are displayed for view to the general public using an Internet browser to access video podcast content via Internet networked servers that are maintained on-line by entities that operate public social media platforms in the jurisdiction of this Court (e.g. Google, LLC, YouTube, LLC, PATREON, INC, etc.).

91. The foregoing described conduct demonstrates the manner in which the Defendant has violated the privacy of the Plaintiff.

## **SECOND CAUSE OF ACTION**

### **Public Disclosure of Private Facts – against Defendant**

#### **Violations of Right to Privacy and False Light against Defendant**

#### **Violation of New York State Privacy Law, Civil Rights Law §§ 50 and 51**

92. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 91, inclusive, as if fully restated herein.

93. Defendant's CSTT enterprise, as directed by Agent Goodman, used Plaintiff's name, photograph, picture, portrait and/or likeness, without his written consent, within the state of New York, for purposes of advertising or trade. Defendant's CSTT enterprise use of Plaintiff's name, photograph, picture, portrait and/or likeness, was a use in, or as part of, an advertisement or solicitation for patronage.

94. Defendant's CSTT enterprise (each of them) published with malice, over the Interstate wires, and republished Plaintiff's name, photograph and/or likeness in multiple formats, including their own promotions and advertisements, websites, social media platforms.

95. Defendant's CSTT enterprise (each of them) use of Plaintiff's name, photograph, image and/or likeness (violation of privacy and false light) – on countless occasions and in numerous

formats - is clearly a recognizable likeness of the Plaintiff and is readily identifiable by someone familiar with him.

96. This tort can be described as, “One who gives publicity to a matter concerning the private life of another is subject to liability to the other for invasion of his privacy, if the matter publicized is of a kind that (a) would be highly offensive to a reasonable person, and (b) is not of legitimate concern to the public.” (Rest.2d Torts, § 652D.)

97. Plaintiff claims that Defendant’s CSTT enterprise (each of them) violated Plaintiff’s right to privacy by his tortious conduct by the publicized private information concerning the Plaintiff, (false light) that a reasonable person in Plaintiff’s position would consider the publicity highly offensive.

98. That Defendant’s CSTT enterprise (each of them) acting via their Agent Goodman knew, or acted with reckless disregard of the fact, that a reasonable person in Plaintiff’s position would consider the publicity highly offensive, that the private information was not of legitimate public concern (or did not have a substantial connection to a matter of legitimate public concern).

99. That the Plaintiff was harmed, and that the Defendant’s CSTT enterprise actions via Agent Goodman’s conduct, acting with actual malice, was a substantial factor in causing Plaintiff’s harm.

100. The Defendant’s CSTT enterprise (each of them) acting in the scope of its authority, released private information about the Plaintiff that was made public by either communicating said information via social media accounts controlled by the Agent Goodman of the Defendant’s CSTT enterprise.

101. Such social media accounts to include Twitter, YouTube, PATREON, SubscribeStar, Vimeo, Banned.Video, Facebook, BitChute, Periscope, etc. These social media services were used to obtain commercial value by the morbid and sensational prying into private life of the Plaintiff for the sake of financial reward.

### **THIRD CAUSE OF ACTION**

#### **Reckless Infliction of Emotional Distress -- Against Defendant**

102. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 102, inclusive, as if fully restated herein.

103. Plaintiff claims that Defendant's CSTT enterprise (each of them) conduct caused him to suffer severe emotional distress due to the recruitment of "gang stalkers" (sufferers in the search for validation from their peers who desire to replace their unnerving emotion of diffuse fear with a determined and righteous anger) for the purposes of attacking the Plaintiff on social media outlets. That the conduct of the Defendant's CSTT enterprise (each of them) were in reckless disregard to the probability that Plaintiff would suffer emotional distress, and that the Defendant's CSTT enterprise (each of them) intended to cause emotional; distress with his outrageous conduct which was a substantial factor in causing Plaintiff's severe emotional distress.

104. The Defendant's CSTT enterprise (each of them) knew accusations of criminal conduct and fraud upon the court would have a detrimental impact on the Plaintiff's technical business career as a Certified Ethical Hacker, which would cause the Plaintiff to endure angst, anxiety, sleep disturbances and concern over future career opportunities, and published such materials with actual malice.

### **FOURTH CAUSE OF ACTION**

#### **Common Law Tort of Trade Libel – Against Defendants**

105. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 104, inclusive, as if fully restated herein.

106. Plaintiff claims that Defendant's CSTT enterprise (each of them) via Agent Goodman, acting in his respective personal and business capacities, harmed Plaintiff by making a statement that disparaged Plaintiff's cyber security and critical infrastructure protection skills. The Defendant's CSTT enterprise (each of them) published statements in a widely disseminated manner across a dozen social media properties that disparaged the ethics, skills, competence and quality of Plaintiff's cyber security and infrastructure protection services. These insinuations, disparagements and slurs were known to the Defendant's CSTT enterprise to be false, but the Defendant's CSTT enterprise (each of them) arranged for publication to tens of thousands of viewers, nevertheless, with actual malice.

107. That Defendant's CSTT enterprise (each of them) knew that these statements and insinuations were untrue; but, acted with reckless disregard of the truth or falsity of these statement, which called out the Plaintiff by his name and likeness, photograph and/or persona which would cause employers and customers in the cyber defense industry to recognize the Plaintiff.

108. That the Defendant's companies (CSTT enterprise), under the control Agent Goodman, acting in his personal and business capacities, knew or should have recognized that someone else might act in reliance on the statement, causing Plaintiff financial loss; and that the Plaintiff suffered direct financial harm because someone else acted in reliance on the statements; and that Defendant's CSTT enterprise conduct was a substantial factor in causing Plaintiff's harm.

109. That such statements were made in video content that appeared on the services YouTube.com, SubscribeStar.com, Odysee.com and PATREON.com and are false advertising creations of the Defendant's CSTT enterprise facilitated by Agent Goodman acting in his personal and business capacities.

## **FIFTH CAUSE OF ACTION**

### **False Advertising – Against Defendant**

#### **Violations of Lanham Act, 11 U.S.C. § 1125(a). Section 1125(a)**

#### **Violations of General Business Law § 350: False advertising unlawful**

110. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 109, inclusive, as if fully restated herein.

111. That the Defendant's CSTT enterprise (each of them) engaged in the deceptive and false advertising concerning video podcasts available under CrowdSource The Truth brand, which are nothing more than hoax journalism and are not to be considered – in any way – to be truthful. This commercial speech, advertising in disguise, is designed to lure the general public to the PATREON, ODYSEE and/or the SUBSCRIBESTAR page via the use of false, deceptive and misleading advertising. These false misrepresentations are designed to deceive the public at large in New York, as a reasonable consumer would assume that fact-checking and vetting is taking place as advertised. In the mind of a reasonable New York consumer CrowdSource The Truth is a fact checking truth engine that relies on the crowd to vet facts.

112. The "ABOUT US" definitions of CrowdSource The Truth that appears at <https://www.patreon.com/crowdsourcethetruth> are misleading, deceptive and designed to lure uninformed consumers; quoting in relevant part:

<p>About Crowdsource The Truth Crowdsource The Truth is an Open Source Fact Checking "Truth Engine" and political social media movement. We gather and disseminate raw intelligence and present it to our constantly expanding network of human brains for vetting, analysis and assessment. Crowdsource the Truth focuses on examining current events, public policy, history, truth in media and other topics of interest. Members work together to collect and analyze data from around the web and around the world. Together, we will do our best to</p>
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determine what is fact and what is fiction. Everyone is invited to participate but of course no one is required to. If you see something you disagree with, challenge it with stronger evidence and logic or simply tune it out. This group is an Autocratic Democracy, to borrow some Orwellian doublespeak from those I wish to examine. I run it, but of course if the group dislikes my decisions the project will fail. All decisions will be subjected to group consensus. If anyone doesn't like the direction, please suggest a change or feel free to bow out."

113. The foregoing statement is entirely false and designed to deceptively entice members of the consuming public in New York to provide credit card donations (as "patrons") to the Defendant's companies (CSTT enterprise) and Agent Goodman. There is no fact checking, issues are not vetted by the community, there is no examination of "evidence", etc. The attestation is false and designed to mislead the consuming public. This violates New York's General Business Law § 350: False advertising unlawful.

114. These claims make Goodman's trade slander and defamation more troublesome as Goodman is stating the claim that his information (slander, defamation) is "vetted" by group-based information evaluation and a credibility assessment, all of which is untrue and false. Thus, Goodman claims his personal opinions have somehow been confirmed by a group analysis. This is false and untrue.

115. The Defendant's CSTT enterprise (each of them) acted in his personal and professional capacities to publish claims they knew to be false, such claims as to a "Truth Engine" were false.

116. Every CrowdSource The Truth video podcast placed on publicly available social media (YouTube, Twitter, FaceBook, Periscope, Bit-Chute, etc.) contains a solicitation to join the credit card driven PATREON, ODYSEE or SUBSCRIBESTAR fan page. These solicitations

are widely disseminated worldwide and to consumers in New York. These social media footprints act as advertisement devices, or advertising in disguise. These “teaser” public podcasts entice, lure, and direct the consuming public to become “patrons” on the PATREON fan page. ( <https://www.patreon.com/crowdsourcethetruth> )

117. The Plaintiff has suffered financial hardship as a result of the commercial trade libel and commercial disparagement via the use of the Defendant’s CSTT enterprise false advertising, which insinuates the Plaintiff is unfit to perform his professional duties as a Certified Ethical Hacker and is engaged in a criminal conspiracy with Richard Loury.

118. These advertisement messages, transported over the Interstate wires, are untrue or misleading, which is known to the Defendant’s CSTT enterprise, or which by the exercise of reasonable care would have been known, to be untrue or misleading, which were disseminated as part of a plan or scheme with the intent not to provide truthful representations, truthful stories, truthful “crowdsourcing”, etc. The Defendant’s CSTT enterprise proceeded in reckless disregard of the truth to publish false and misleading information to the consuming public in New York.

119. That the foregoing allegations violate the Lanham Act at 11 U.S.C. § 1125(a). Section 1125(a) which creates two distinct bases for liability: false association, and false advertising. The Plaintiff alleges the Defendant and his CSTT enterprise violated both Lanham Act provisions. These actions also violate General Business Law § 350: False advertising unlawful.

## **SIXTH CAUSE OF ACTION**

**Violations of the Federal Trade Commission Act, 15 U.S.C. § 45(a) by Defendant**

**Violations of New York’s General Business Law § 349 - Deceptive acts and practices**

120. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 119, inclusive, as if fully restated herein.

121. Defendant's 21<sup>st</sup> Century 3D social media properties (CSTT enterprise) practices as described above constitute deceptive acts or practices in violation of Section 5 of the Federal Trade Commission (FTC) Act, 15 U.S.C. § 45(a). New York consumers have suffered, and will continue to suffer, substantial injury as a result of Defendant and his CSTT enterprise violations of the FTC Act. In addition, Defendant and his CSTT enterprise has been unjustly enriched as a result of these unlawful acts or practices. Absent injunctive relief by this Court, Defendant and his CSTT enterprise will likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

122. Acts or practices of the Defendant and his CSTT enterprise are unfair under Section 5 of the FTC Act as they cause or are likely to cause substantial injury to consumers that consumers cannot reasonably avoid themselves and that is not outweighed by vailing benefits to consumers or competition. 15 U.S.C. § 45(n). The Defendant's companies (legal fictions) and the CSTT enterprise utilized their Agent Goodman, acting in a professional and business capacity, to facilitate these actions.

123. The CrowdSource The Truth CSTT enterprise acts and/or practices in processing fraudulent and unauthorized transactions to consumers' credit card accounts with the intent to defraud, as described in foregoing paragraphs above, have caused or are likely to cause substantial injury to consumers that is not reasonably avoidable by consumers themselves and that is not outweighed by vailing benefits to consumers or competition. Such injury is the predictable result of the acts or practices described in the paragraphs above.

Therefore, the CrowdSource The Truth CSTT enterprise s acts or practices, as described above, constitute unfair acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. §§ 45(a) and 45(n). Such activity is a violation of New York’s General Business Law § 349 - Deceptive acts and practices.

## **SEVENTH CAUSE OF ACTION**

### **Defamation by Implication – Against Defendants CSTT Enterprise**

124. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 123, inclusive, as if fully restated herein.

125. That the CrowdSource The Truth CSTT enterprise was used to publish statements and cause statements to be published that are materially false concerning any cooperation on the part of the Plaintiff to assist, participate or collaborate in any scheme to docket forged documents in this Court.

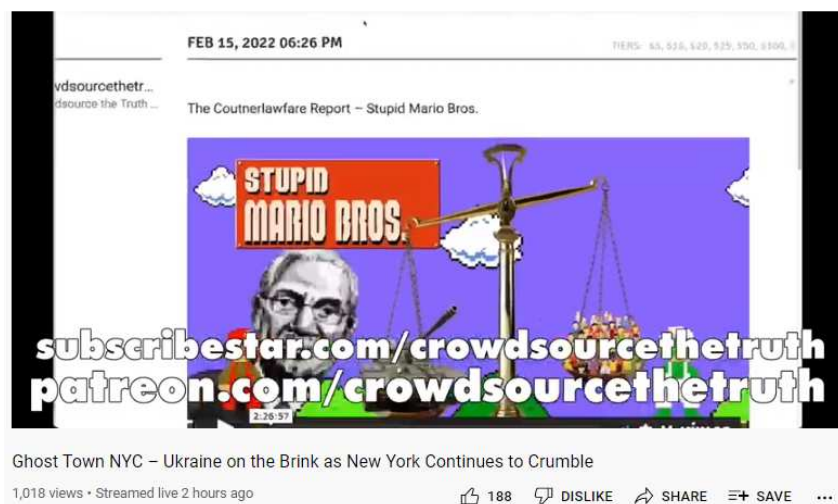
126. The CrowdSource The Truth CSTT enterprise’s use of “the Sweigert brothers” and the “Super Mario Brothers” in an opened and continuous podcast series indicates the portrayal that somehow the Plaintiff is cooperating with his estranged brother (“Webb”), which the CrowdSource The Truth CSTT enterprise agents like Goodman know to be false, and have proceeded in reckless disregard to the truth to state otherwise.

127. That the CrowdSource The Truth CSTT enterprise places content on PATREON, ODYSSEE and SUBSCRIBESTAR under the banner of the COUNTER LAWFARE REPORT which implicates the “Super Mario Brothers”. See below:



<https://twitter.com/csthetruth/status/1493779009854967808>

128. The above Twitter tweet published by the CrowdSource The Truth CSTT enterprise promotes the COUNTER LAWFARE REPORT on privatized pay-wall credit card channels, as does the YouTube video, shown below, which promotes the same program entitled, *Ghost Town NYC – Ukraine on the Brink as New York Continues to Crumble*, published Feb. 21, 2022.



<https://www.youtube.com/watch?v=XXIW9QXb3r8>

129. This privatized program (see above) that is advertised on the public video *Ghost Town NYC – Ukraine on the Brink as New York Continues to Crumble* features content concerning the criminal conspiracy by the “Stupid Mario Brothers”. This implicates the Plaintiff in a confabulation with “GEORGE WEBB” concerning a crime, according to the Defendant on his CSTT enterprise publications, and implicates the Plaintiff in such a crime.

130. Goodman directs people to his COUNTER LAWFARE website, displaying *Goodman v. Bouzy* and “GEORGE WEBB” (SDNY), revealing the identity of a “Super Mario Brother”.



<https://www.youtube.com/watch?v=VQAFqyoliBA>



131. Defendant and his CSTT enterprise (each of them) published discrete facts in such a way that they create a substantially false and defamatory impression by omitting material facts or juxtaposing facts in a misleading way.

132. Defendant and his CSTT enterprise (each of them) published these discrete facts by innuendo, and that Defendant and his enterprise intended or knew the implications that the public could draw from the allegedly defamatory material. These statements were published with a reckless disregard to the truth by the Defendant on his enterprise and published with actual malice. The Defendant's enterprise (each of them) intended to convey a false impression that the Plaintiff had violated the Michigan Penal Code.



133. Defendant and his CSTT enterprise (each of them) acted with negligence and actual malice to distribute these falsehoods. The Defendant and his enterprise's implications that the Plaintiff conspired with "GEORGE WEBB" are materially false.

134. That Defendant and his CSTT enterprise (each of them) published statements capable of interpretation by a reasonable listener as stating "actual facts" about the Plaintiff, as opposed to statements of opinion.

### **EIGHTH CAUSE OF ACTION**

#### **Vicarious Liability Against Defendant**

135. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 134, inclusive, as if fully restated herein.

136. In all of the tortious acts described in this complaint vicarious liability is imposed upon all CrowdSource The Truth CSTT enterprise components (each of them). There is a direct causal relationship between the tortious conduct of the CrowdSource The Truth CSTT enterprise and the Plaintiff's injuries. The CrowdSource The Truth CSTT enterprise (each of the components) acted as legal entities, 21<sup>st</sup> Century 3D and agent Goodman, or Jason Goodman in his personal capacity. There was actual participation by the sole owner Goodman, using 21<sup>st</sup> Century 3D, in the tortuous corporate conduct. The sole owner participated in the wrongdoing and/or authorized such conduct and/or directed that such acts described above be done by his corporate proxies (the Defendant's enterprise, each of them). Agent Goodman acted dependently in a manner that serves the interest of the CrowdSource The Truth CSTT enterprise creating a nexus between the Goodman's corporate responsibilities and the offensive acts described in this claim Complaint.

137. Although Agent Goodman specifically knew or reasonably should have known that his tortious activity under his control could injure Plaintiff, the CrowdSource the Truth CSTT enterprise and Agent Goodman negligently failed to take or order appropriate action to avoid the harm as part of his official duties, and in his personal capacities, as an agent of 21<sup>st</sup> Century 3D. An ordinarily prudent person, knowing what the sole owner of the CrowdSource The Truth CSTT enterprise knew at that time, would not have acted similarly under the circumstances. Therefore, under the doctrine *respondeat superior* liability is imposed upon 21<sup>st</sup> Century 3D.

## NINTH CAUSE OF ACTION

### Vicarious Liability Against Social Media Defendants

138. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 137, inclusive, as if fully restated herein.

139. Both TWITTER.COM and YOUTUBE.COM, as operated by various business entities to include X CORP. and ALPHABET, INC. have profited from Jason Goodman's continues slander, defamation, privacy violations and other tortious conduct.

140. Both X CORP. and ALPHABET, INC. profit from user views of their web-site service and viewer engagement. In this regard, both entities have a vested interest in the continuation of Goodman's presence on their platforms to draw views.

141. Both entities have been contacted several times via e-mail message and U.S. mail of the foregoing tortious behavior of Goodman but have allowed Goodman to continue with inauthentic accounts that violate the ban evasion provisions of the User Acceptance Agreements. By ignoring Goodman's behavior of created ban evasion accounts, both parties (TWITTER.COM and YOUTUBE.COM) have awareness and knowledge that Goodman is in violation of their ban evasion prohibitions in the User Acceptance Agreements, which gives

Defendants TWITTER/YOUTUBE the right, in their sole discretion, to terminate, suspend or restrict users' subscriptions, thereby limiting their access to uploading or downloading content to or from Defendants' servers. However, both parties have chosen to allow Goodman's ban evasion although notified about Goodman's conduct a dozen times.

142. Under the doctrine of promissory estoppel, these social media Defendants are prohibited from inconsistent enforcement of their public ToS/UUA/UAP contract terms. The public relies on these promises that the social media Defendants will monitor and terminate toxic content that violates these policies. The public relies on the social media Defendants to consistently enforce these policies, which they have not done.

## **TENTH CAUSE OF ACTION**

### **Violations of Indiana State Law (Supplemental Jurisdiction)**

143. Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 142, inclusive, as if fully restated herein.

144. In violation of Indiana's Right to Publicity Act, Ind. Code Ann Sec. 32-36-1-8, Goodman also publishes vile falsehoods of the undersigned's father on the Twitter account "GHenryDickFace". Mr. Goodman's character assassination publications [EXHIBIT FOUR] are designed to disgrace the military service of George H. Sweigert, Staff Sergeant, U.S. Army with service in World War II in the South Pacific at Guadalcanal, Bougainville, the Fiji Islands, the liberation of Manilla, New Guinea and other combat operations involving the 37<sup>th</sup> Division of the U.S. Army. The plaintiff is the heir to George H. Sweigert who died while domiciled in Fort Wayne, Indiana in 1999.

145. The Plaintiff prays that this Court will review the issues concerning the Plaintiff's father by determine Indiana to be the choice of law.

**DAMAGES**

146. Plaintiff seeks damages and equitable relief on behalf of himself, which relief includes, but is not limited to, compensatory and punitive damages, an order enjoining the Defendant and his CSTT enterprise (all of them) from the use of the Plaintiff's likeness, name and/or persona in social media podcasts, as well as Plaintiff's future reasonable attorneys' fees and expert fees, and any additional relief that this Court determines to be necessary or appropriate to provide complete relief to Plaintiff.

147. Defendant and his CSTT enterprise (all of them) acts and conduct have caused damage to Plaintiff and Plaintiff is entitled to recover from Defendant and his CSTT enterprise the damages sustained by Plaintiff as a result of Defendant and his enterprise's wrongful acts in an amount subject to proof at trial. Plaintiff suffered from fear and confusion, self-doubt, anger, disbelief, shock, gloom, isolation, bewilderment as a direct and in direct of the Defendants enterprise (all of them) actions.

148. Plaintiff seeks an order of this Court awarding damages, restitution, disgorgement, injunctive and/or declaratory relief and all other relief allowed.

Signed September 23, 2023 (9/23/2023),



**D. G. SWEIGERT, C/O  
AMERICA'S RV MAILBOX, PMB 13339  
514 Americas Way, Box Elder, SD 57719**

# EXHIBITS

It is hereby certified that all attached exhibits are true and accurate copies of the originals.

I hereby attest that the attached public documents are true and accurate artifacts under the penalties of perjury. Signed September 23, 2023 (9/23/2023),

A handwritten signature in black ink, appearing to read 'D. G. Sweigert', with a stylized flourish at the end.

**D. G. SWEIGERT, C/O  
AMERICA'S RV MAILBOX, PMB 13339  
514 Americas Way, Box Elder, SD 57719**

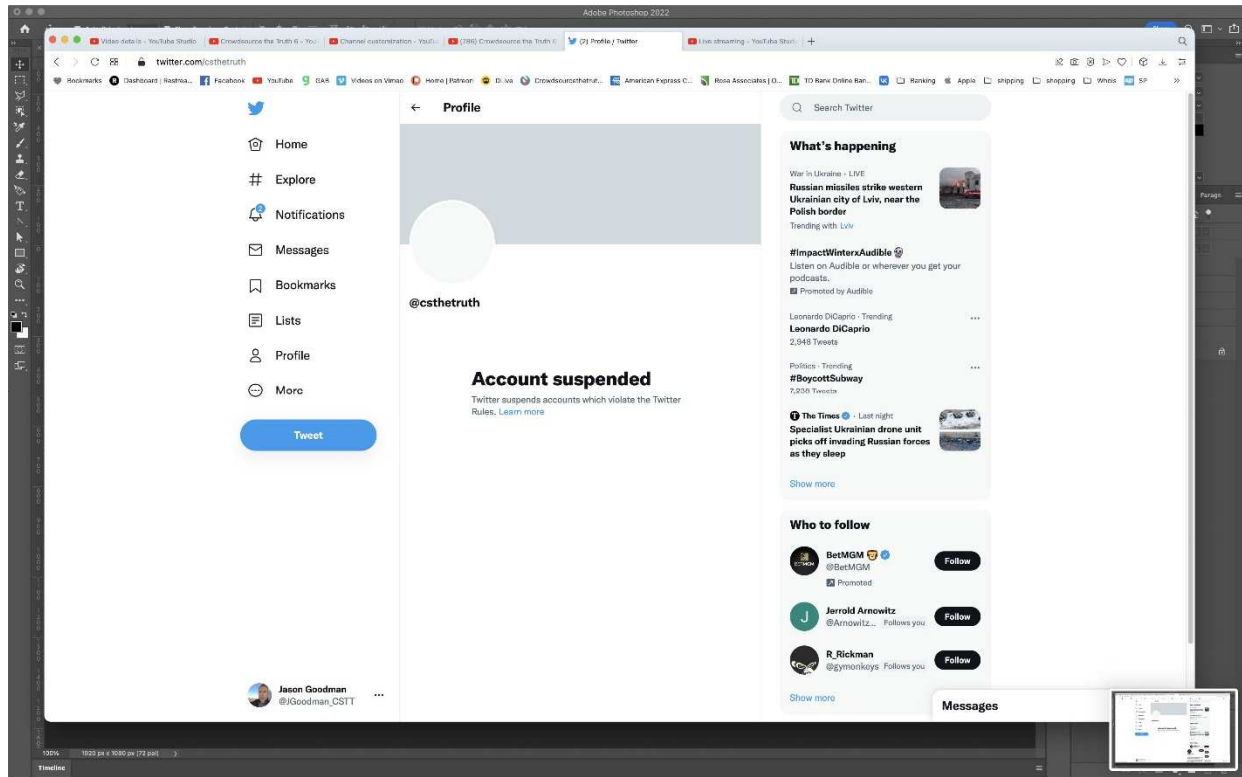
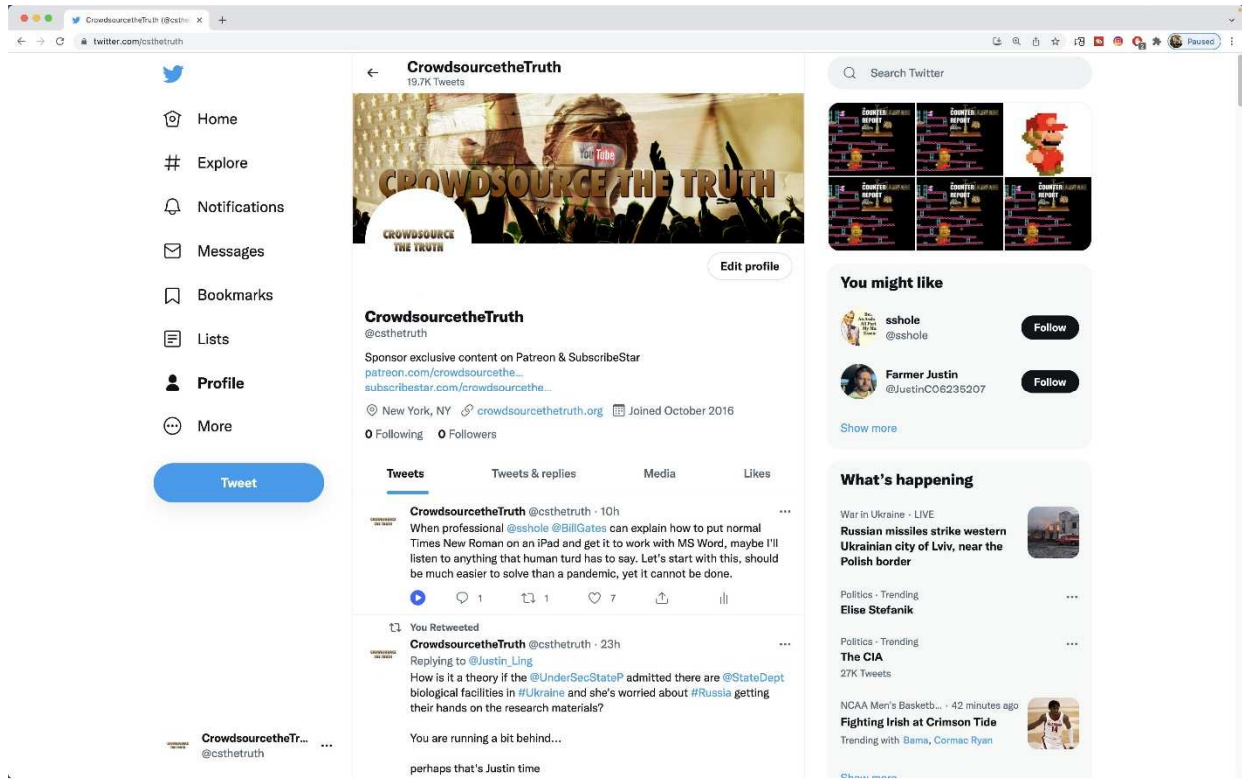
**EXHIBIT ONE**

[https://twitter.com/XposeSTUPIDbros/with\\_replies](https://twitter.com/XposeSTUPIDbros/with_replies)











File 1: Uploaded as  
"SweigertVCNNDrainSummons\_PDF\_  
fillable2021.pdf", saved and attached  
as "File\_1\_ProSe\_20210617\_16\_11\_  
34\_270.pdf"  
Description: Summons Request

On Thu, Jun 17, 2021 at 4:07 PM [REDACTED]  
[REDACTED] <[REDACTED]>  
wrote:

Mr. Sweigert,

We have not received the document through  
the Temporary Pro Se Document Upload  
Program. We can not issue the Summons  
until you correctly submit the document.

Best,

[REDACTED]

Pro Se Case Administrator

U.S. District Court - Eastern District of  
Michigan

Direct Phone: (313) 234-5013

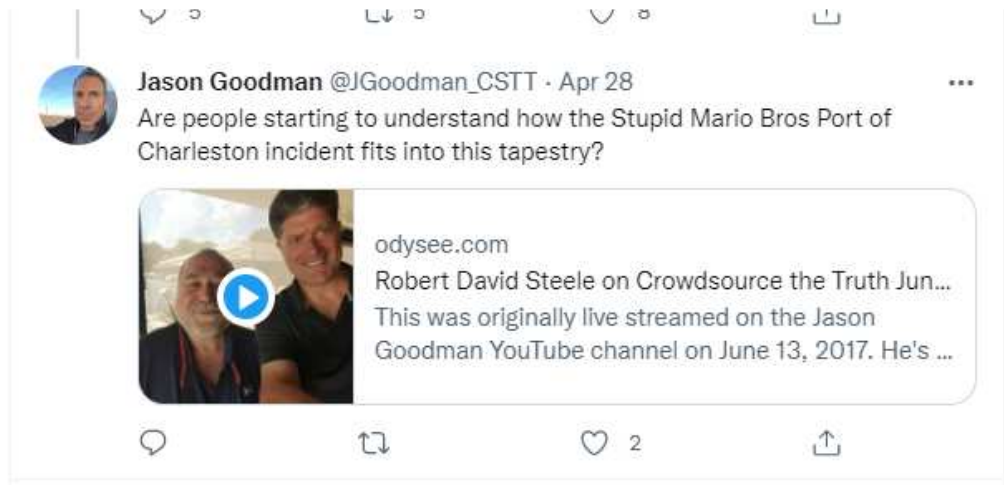
[\[REDACTED\]](#)

**EXHIBIT TWO**

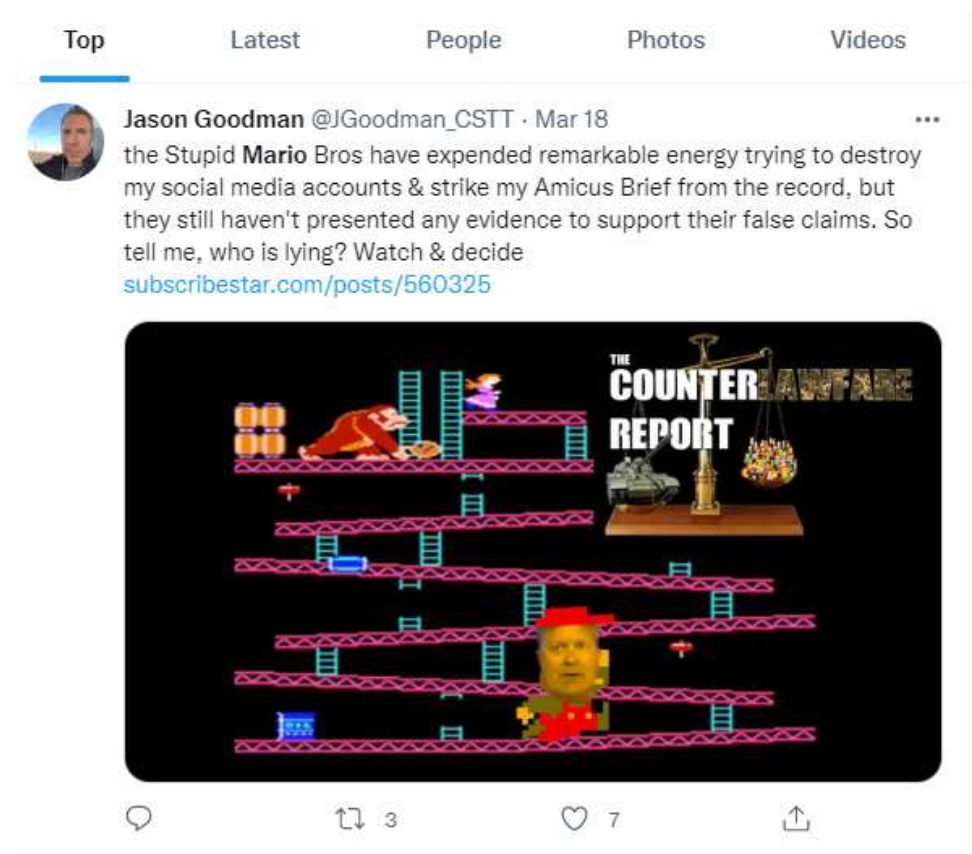
[https://twitter.com/JGoodman\\_CSTT](https://twitter.com/JGoodman_CSTT)



[https://twitter.com/JGoodman\\_CSTT/status/1519649224706637825](https://twitter.com/JGoodman_CSTT/status/1519649224706637825)



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<https://twitter.com/XposeSTUPIDbros/status/1509641726557839370>








**Jason Goodman**  
 793 Tweets





Follow




**Jason Goodman** @JGoodman\_CSTT · 2h  
 George Webb & his reprehensible brother are actively working to get [@OdyseeTeam](#) removed from the internet. These subversive operators are un-American enemies of free speech & should be jailed. Watch the Counterlawfare Report  
[subscribestar.com/crowdsourcethe...](#)  
[patreon.com/crowdsourcethe...](#)


You reported this Tweet.

View




 1
 
 1
 



**Jason Goodman** @JGoodman\_CSTT · 2h  
 don't email me saying GW is a journalist, he's a dangerous liar & he's part of the effort to destroy the U.S. Constitution & America itself. He's said in his own words he would always protect [@BarackObama](#) [#traitor](#) lots of unflattering evidence on Odysee



[odysee.com](#)  
 Getting the Big G out of the Big House v2 (original...  
 As everyone now knows, intrepid investigator George Webb was arrested on June 15, 2017 under...



 1
 

**EXHIBIT THREE**

<https://www.youtube.com/watch?v=qTuXPFoZERk>



[Crowdsourcethe Truth 5](#)

Crowdsourcethe Truth 5

10K subscribers

SUBSCRIBED

Webb of lies falls apart as "David v Goliath" CNN case gets dismissed six ways to Sunday.

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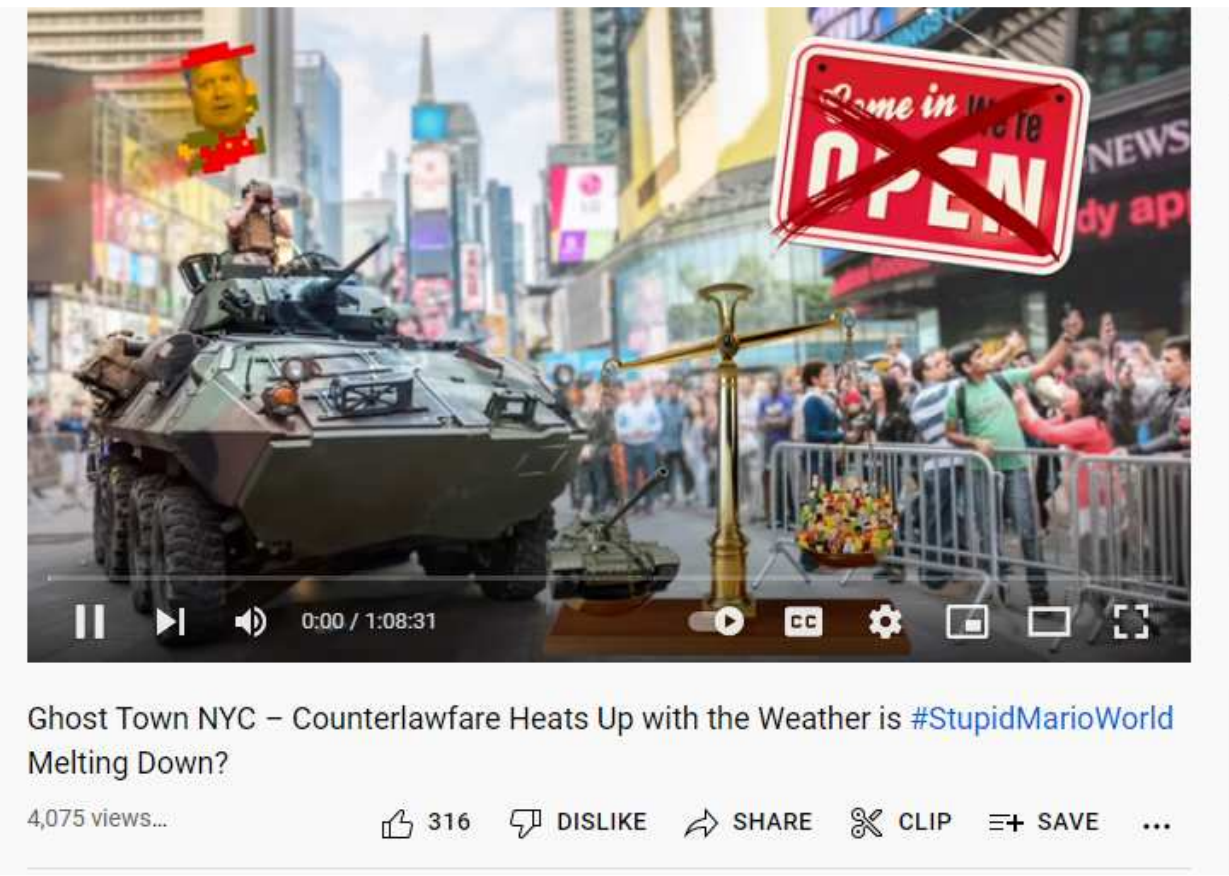
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<https://www.youtube.com/watch?v=hrPfebLivPI>



[Crowdsource the Truth 5](#)

Crowdsource the Truth 5

10K subscribers

SUBSCRIBED

**#NYC #Lawfare #StupidMarioBros** An amended Amicus Curiae Brief has dropped like a MOAB on the docket in Detroit sending shockwaves through Stupid Mario World.

The weather is warming up as some people face the real possibility of jail. subscribe to Crowdsource the Truth on Rumble - <https://rumble.com/user/csthetruth> subscribe to Crowdsource the Truth on Odysee - <https://odysee.com/@Crowdsourcethetruth...> Please sponsor the Crowdsource the Truth lawfare Fund at <http://www.crowdsourcethetruth.com>. Become a sponsor & enjoy exclusive content on SubscribeStar & Patreon Get a FREE 3-Day trial at <http://www.subscribe-star.com/crowdsou...> <http://www.patreon.com/crowdsourcethe...>

[emphasis added]

**EXHIBIT FOUR**

**<https://twitter.com/GHenryDickface>**





<https://twitter.com/GHenryDickface/status/1519312008390270978>



GeorgeHenryDickface  
@GHenryDickface

...

CIA Dave Acton court testimony

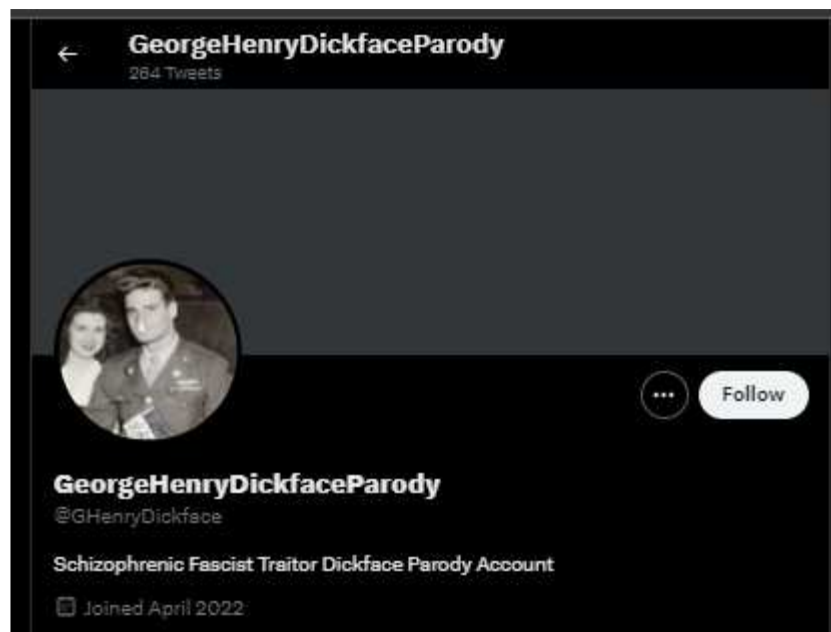


odysee.com

CIA Dave Acton court testimony George Webb part1of2  
View CIA Dave Acton court testimony George Webb part1of2  
on Odysee

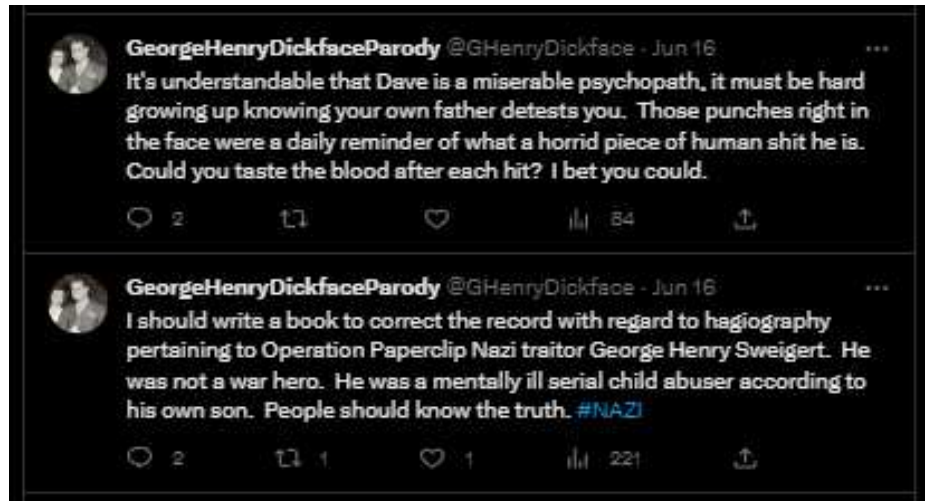
6:46 AM · Apr 27, 2022 · Twitter Web App



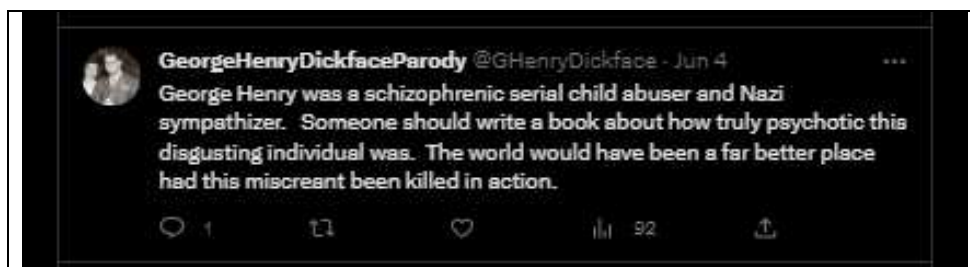
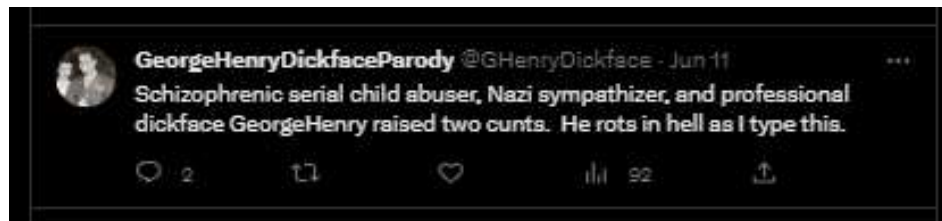


<https://twitter.com/GHenryDickface>













**EXHIBIT FIVE**



**<https://twitter.com/spoliati1>**



<https://twitter.com/cheburashka1964>



<https://twitter.com/csthetruth>

**EXHIBIT SIX**

